

March 14, 2025

## VIA ECF

Magistrate Judge Peggy Kuo United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

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Re: State Farm Mut. Auto. Ins. Co. v. Metro Pain Specialists P.C., 21-cv-5523 (E.D.N.Y.) -Request for Adjournment of Hearing re M. Torres

Dear Judge Kuo:

Plaintiffs State Farm Mutual Automobile Insurance Co. and State Farm Fire and Casualty Co. (collectively, "Plaintiffs") respectfully request an adjournment of the show cause hearing regarding non-party Michael Torres' failure to comply with Plaintiffs' subpoena presently scheduled for March 18, 2025. See 2/27/2025 Text Order. Plaintiffs have conferred with counsel for Mr. Torres who consents to this adjournment request.

The parties have made significant progress toward resolving this dispute. On January 15, Mr. Torres made an initial production of documents responsive to Plaintiffs' subpoena. On March 5, 2025, Mr. Torres made a supplemental production. Plaintiffs have reviewed the production and are in the process of resolving some minor outstanding issues with Mr. Torres. The parties respectfully submit additional time is necessary and appropriate to allow them to fully resolve this dispute and to preserve judicial economy.

Accordingly, the parties respectfully request the Court adjourn the show cause hearing presently scheduled for March 18 (2/27/2025 Text Order), until March 28, 2025.

Respectfully submitted,

/s/ Christopher T. Cook

Christopher T. Cook